

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

JONATHAN VILLARREAL,

*Plaintiff,*

vs.

JOHN SAENZ; MIGUEL VILLARREAL,  
JR; and GUNN, LEE & CAVE, P.C.,

*Defendants.*

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No. 5:20-CV-00571-OLG

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**PLAINTIFF'S MOTION FOR AN EXTENSION OF TIME TO OBTAIN NEW  
REPRESENTATION**

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**TO THE HONORABLE JUDGE RICHARD B. FARRER:**

COMES NOW, Plaintiff, Jonathan Villarreal, *pro se*, respectfully requesting an order granting an additional 45 days in which to obtain new representation. Plaintiff would respectfully show the court as follows:

1. **VIOLATION OF PLAINTIFF'S 14TH AMENDMENT CIVIL RIGHTS AND PROCEDURAL DUE PROCESS**

Pursuant to Texas Disciplinary Rule 3.03(a)(1), a lawyer may not knowingly make a false statement of material fact or law to a tribunal; pursuant to Texas Disciplinary Rule 3.03(a)(2), a lawyer may not knowingly fail to disclose a fact to a tribunal when disclosure is necessary to avoid assisting a criminal or fraudulent act; pursuant to Texas Disciplinary Rule 3.03(a)(5), a lawyer may not knowingly offer or use evidence that the lawyer knows to be false.

Former legal representation for plaintiff, The Vethan Lawfirm has intentionally perjury to the extent that their actions unconstitutionally and critically impacted the report and recommendation of the court. *see* Dkt No. 58 at 7-8 “*The Extensive Delay*,”

Plaintiff's First Amended Application for Seizure, Temporary Restraining Order, Preliminary Injunction, and Permanent Injunctive Relief, was DENIED. Dkt. Nos. 34 (sealed copy) & 37 (redacted copy for the public record).

2. **COVID-19 WAS NEVER A REASON FOR LATE FILING OF THE LAWSUIT, NEGLIGENCE OF PLAINTIFF'S FORMER LEGAL REPRESENTATION IS SHOWN IN EXHIBIT "A."**

**SUPPORT**

1. Plaintiff engaged the Vethan Law Firm **October 29th, 2021**
2. The last email plaintiff sent to defendant Mike Villarreal (who was representing defendant John Saenz and plaintiff at the same time, while internal disputes were happening) was **October, 11th, 2019**.
3. Plaintiff tried to exit the legal relationship with defendant Mike Villarreal four (4) times in written emails, and Mike Villarreal continued to pressure plaintiff into working things out with Defendant John Saenz.
4. The period of time that lapsed between seeking counsel to file a lawsuit against John Saenz was **12 business days**.
5. **Exhibit A** is dated **Feb, 2nd 2020** and shows the following:
  - Initial engagement date - **October, 29th 2019**
  - Total hours worked on the matter - **1.3 hours**
  - Last date worked **December, 17th 2019**
6. After months of requesting status updates, and finally threatening to report The Vethan Lawfirm to the Texas Bar Association, plaintiff is sent a new engagement letter from The Vethan Law Firm on **March 4th, 2020**, now asking for more money to start the lawsuit.

3. **PLAINTIFF INFORMED DEFENSE OF THE PERJURY, YET NO ACTION WAS TAKEN, THERE WAS NO MOTION TO REHEAR FILED, THERE WERE NO ETHICAL OBJECTIONS, NOR WERE THERE ANY INQUIRIES INTO THE MATTER BY THE DEFENSE.**

Because of these actions and the aforementioned, plaintiff is respectfully requesting that the court grant a 45 day extension to find legal representation that can fully understand the case, dedicate the proper amount of time to the matter, and not put plaintiff into another dire situation due to unclean hands.

**PRAYER FOR RELIEF**

4. For the reasons set forth above, Plaintiff requests that this court grant *Plaintiff's Motion for an Extension of Time to Obtain New Counsel*, and to extend the deadline to obtain new counsel up to September 9th, 2021.

Respectfully, Submitted,

Jonathan Villarreal, Plaintiff, *pro se*

Jonathan Villarreal

28251 Boerne Stage Rd

Boerne, TX 78006

830-499-3071

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was electronically filed with the Court on the 26th day of July 2021, and electronically served on the date reflected in the ECF system upon all parties registered to receive notice pursuant to the Court's CM/ECF system.

*Jonathan Villarreal*

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Jonathan Villarreal, *pro se*